

LINCOLN PAPER AND TISSUE CO., INC.)	DEPARTMENTAL
PENOBSCOT COUNTY) FINDING OF FACT AND ORDER
LINCOLN, MAINE) PART 70 AIR EMISSION LICENSE
A-177-70-B-C) AMENDMENT #1

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Sections 344, 587 and 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Lincoln Paper and Tissue (LPT)
LICENSE NUMBER	A-177-70-B-C
LICENSE TYPE	Part 70 Major Change
NAICS CODE	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	Lincoln, Maine
DATE OF INITIAL LICENSE ISSUANCE	October 22, 2002
DATE OF AMENDMENT # 1 ISSUANCE	January 31, 2005
LICENSE EXPIRATION DATE	October 22, 2007

Lincoln Paper and Tissue Company, Inc. (LPT) operates a fully integrated pulp and paper mill in Lincoln, Maine. A Part 70 Air Emission License # A-177-70-A-I was issued on October 22, 2002 permitting the operation of emission sources at the mill. On May 20, 2004, the Part 70 Air license and pending applications were transferred to LPT by Department Order.

This license amendment seeks a Part 70 Major Change to its Part 70 Air Emission License to incorporate the Department's Chapter 124 revised brownstock washer control deadline, a one year extension of the pulp washing system control deadline in 40 CFR Part 63, Subpart S, and updates per Chapter 101 of the Department's regulations.

II. DESCRIPTION OF PART 70 MAJOR CHANGE AND BPT

A. Changes to Chapter 124.

LPT is subject to Chapter 124, Total Reduced Sulfur Control From Kraft Pulp Mills, of the Department regulations. Chapter 124 was recently reopened and Section (3)(D) changed to:

‘Owners and operators subject to this Chapter shall collect and control TRS emissions greater than 0.75 lb/hr from the brownstock washer system to meet the conditions of (3)(A) by April 17, 2007. Sources which propose replacing a brownstock washer line with a new system will have until the MACT standard compliance date to meet the conditions in Section 3(A) of this Chapter.’

Section 3(E) of Chapter 124 was also revised to the following:

‘By April 17, 2007, each HVLC collection system subject to this Chapter shall maintain a 96% collection and control uptime based on quarterly brownstock washer system operating time on a total mass weighted basis.’

Prior to these revisions, LPT’s Part 70 Air Emission License required the following:

Specific Condition (31)(A)(1), page 63

No later than April 17, 2005, the brown stock washer system shall be collected and controlled when the washer system is in use to meet the requirements of Chapter 124 of the Bureau of Air Quality’s regulations.

Specific Condition (31)(A)(4), page 63

No later than April 17, 2005 the HVLC system shall maintain a 96% collection and control uptime based on quarterly brownstock washer system operating time on a total mass weighted basis.

LPT has requested to revise the compliance dates for the brownstock washer control deadline as stated in their Part 70 air license (April 17, 2005) to what is reflected in the revised Chapter 124 Department regulation (April 17, 2007).

B. Extension of the Deadline in 40 CFR Part 63, Subpart S for Pulp Washing Systems and Affected Knotters, Screens and Deckers.

LPT is subject to National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Pulp and Paper Industry contained in *Title 40 Code of Federal Regulations* [40 CFR] Part 63 Subpart S. That NESHAP establishes a compliance

date of April 17, 2006 for equipment listed in 40 CFR Section 63.443(a)(ii) – (v), which includes pulp washing systems, oxygen delignification systems and certain knotter, screen and decker systems. This requirement was incorporated into LPT's Part 70 Air Emission License as follows:

Specific Condition (29)(4), page 57

By April 17, 2006, LPT shall control HAP emissions from their HVLC system, including their knotter, decker, pulp washing and oxygen delignification systems, as specified in 64.443 (a)(1)(ii). The closed vent systems shall meet the requirements as specified in 40 CFR Subpart S §63.450. Periods of excess emissions reported under 40 CFR Subpart S §63.455 shall not be a violation of 40 CFR Subpart S §63.443(d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi annual reporting period does not exceed four percent for control devices used to reduce the total HAP emissions from the HVLC system. Each kraft pulping system shall achieve compliance with the pulping system provisions of 40 CFR Subpart S §63.443 for the equipment listed in 40 CFR 63.443(a)(1)(ii) through (a)(1)(v) by April 17, 2006 and LPT shall establish updates and milestones as specified in 40 CFR Subpart S §63.455 (b).

Specific Condition (31)(A)(2), page 63

After April 17, 2006, if shower water containing more than 400 ppm by weight of HAPS is used on the Decker, LPT shall collect the NCGs and vent them to the HVLC system.

LPT requests a one year compliance extension of the deadlines under Subpart S for control of HAP emissions from the pulp washing system and any affected knotter, screen and decker systems at the mill. For the Brown Stock Washers, LPT is investigating incineration in the recovery furnace, boiler, or stand-alone incinerator. At this time, there has been no determination made as to what emission controls or process modifications will be required to meet the relevant standards. The additional time will allow LPT the opportunity to investigate the potential replacement of the mill's existing washing line with a new low flow washer that would create a superior environmental result. LPT proposes to perform additional testing to determine the capability of the present system before ordering long lead-time items such as new hoods which reduce airflow from the existing drum washers. This extra time for testing and for system engineering and upgrades is difficult to account for because of the overlap and interpretations of the federal MACT requirements, state regulations, and the best methods to satisfy both HAP and TRS control requirements.

Pursuant to the NESHAP General Provisions Section 63.6(i)(4)(i)(A) and (B) the compliance deadline in Subpart S may be extended up to one year when a source needs additional time to install controls and the source submits a timely request. LPT has submitted a timely request under 40 CFR § 63.6(i)(4)(i)(B) because it was made more than 120 days in advance of the compliance date. Based on the facts described above, the Department approves the one year extension of the compliance deadline of requirements in Subpart S for the brownstock washer and affected knotters, screens and deckers. This extension applies to all requirements in Subpart S related to such equipment including control, testing, monitoring, reporting, and recordkeeping requirements.

C. Chapter 101 Revisions

To reflect changes to Chapter 101 since the issuance of Lincoln Paper and Tissue's Part 70 air emissions license issuance, Condition (14) K on page 43 will be revised. The Order section of this amendment contains the new language.

III. Application Classification

The application for a one year MACT compliance extension has been processed as a Part 70 Major Change under Section 10 of Chapter 140 of the Department's regulation for Part 70 sources. As required by Section 10 of Chapter 140 and 38 M.R.S.A. § 587, a public notice was published in the newspaper notifying the public of the request for compliance extension, the opportunity for interested parties to submit written comments and the opportunity to request a public hearing, if justified.

Based on the information submitted by LPT, the Department approves LPT's request to change its Part 70 air license conditions pertaining to the deadline for control of brownstock washers to align with the deadline as established in Chapter 124. The Department also grants a one year extension to the control deadline under 40 CFR Part 63, Subpart S for control of pulp washing systems and affected knotter, screen and decker systems at the mill and incorporation of Chapter 101 updates.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and

- will not violate applicable ambient air quality standards, or increment standards either alone or in conjunction with emissions from other sources.

The Department hereby grants this Part 70 Major Change, subject to the conditions found in Part 70 Air Emission License A-177-70-A-I and the following conditions:

NEW CONDITIONS

- (1) In paragraphs (4) and (8) of Specific Condition (29) all references to a compliance date of April 17, 2006 shall be replaced with a compliance date of April 17, 2007.
- (2) In paragraphs (A)(1), (A)(2) and (A)(4) of Special Condition (31) all references to a compliance date of April 17, 2005 shall be replaced with a compliance date of April 17, 2007.
- (3) Condition (14) K of Air Emission License A-177-70-A-I shall be revised as follows:

LPT has installed, calibrated and shall maintain on each stack of the #2 Recovery Boiler a COM in accordance with Chapter 117. An averaging of opacity recorded from each stack's COM will be used for compliance purposes. However, the recovery boiler, at times, also operates with total flow through a single stack. In this event, opacity compliance would be based on the reading from the single stack and not averaged with zero emission from the other stack. [MEDEP Chapter 140, BPT]

Visible emissions from the #2 Recovery Boiler shall not exceed an opacity of 20 percent (based on the average of both stacks respective 6 minute block averages or from a single stack per scenario stated above) for 98 percent of all six (6) minute block averages on a quarterly basis and 99 percent of all six (6) minute block averages on a four consecutive quarter basis. Periods of start-up, shutdown and malfunctions are included for the purpose of calculating six (6) minute block averages over 20 percent under this subsection. Quarterly basis is the period of time from January 1 to March 31, April 1 to June 30, etc. [MEDEP Chapter 101, BPT]

Beginning March 12, 2004, Kraft Recovery Boiler units are required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared for each unit under 40 CFR 63.866(a), when the average of ten (10) consecutive six (6) minute block averages results in a measurement greater than 20 percent opacity. [MEDEP Chapter 101, BPT]

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LPT may apply for exemptions due to start-up as allowed for under 38 M.R.S.A Section 349 Subsection 9. LPT may still apply for exemption of exceedances as allowed for by Maine Statute. [38 M.R.S.A Section 349 Subsection 9]

(4) This Part 70 Major Change shall expire concurrently with Part 70 Air Emission License A-177-70-A-I.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2005.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 24, 2003

Date of application acceptance: June 30, 2003

Date filed with Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality